

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF OKLAHOMA

State of Oklahoma  
Plaintiff

vs.

Case Number: 05-CV-0329-GKF-SAJ

Tyson, et al.,  
Defendants

**EXHIBIT LIST FOR PRELIMINARY INJUNCTION HEARING**

**SUBMITTED BY ATTORNEY:** W.A. Drew Edmondson, Attorney General

**PARTY REPRESENTED:** Plaintiff

No.	Ofr	Obj	Adm	Description
1				Oklahoma 2004 Water Quality Assessment Integrated Report
2				Letter to Arkansas Governor Mike Huckabee and Oklahoma Governor Frank Keating re: resolve problem of phosphorus in the Illinois River watershed
3				Draft – Arkansas Soil Nutrient Management Planner and Applicator Certification Act; And For Other Purposes
4				Figure C-1, C-2 and C-3 re: Pollution Sources
5				Oklahoma NPDES Discharges within the Illinois River, Flint Creek and Barren Fork Scenic River Watersheds
6				Basin-wide Pollution Inventory for the Illinois River Comprehensive Basin Management Program – Final Report
7	hgs			2006 Report of the Oklahoma Beneficial use Monitoring Program Streams Report
8				Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers
9				Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers- Calendar Year 2003 Update Report
10				Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers – 2005 Update
11				Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers – 2006 Update
12	✓	none	Adm	Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers – 2007 Update
13				Title 785 Oklahoma Water Resources Board, Chapter 45. Oklahoma's Water Quality Standards
14				Title 785 Oklahoma Water Resources Board, Chapter 46. Implementation of Oklahoma's Water Quality Standards
15				Diagnostic and Feasibility Study on Tenkiller Lake, Oklahoma

No.	Ofr	Obj	Adm	Description
16 ✓	✓	NO 4P	Adm	Implementation Guidance for Ambient Water Quality Criteria for Bacteria
17	✓	NO 13	Adm	CV -- Lawrence
18				Illinois River Watershed Bacterial Synopsis
19				Redacted Version Illinois River Watershed: Issues Related to Human Health Damages as produced to defense counsel
20				Escherichia Coli Survival in Mantled Karst Springs and Streams, Northwest Arkansas Ozarks, USA
21				Dry Poultry Manure Management
22				Poultry and Water Quality
23				Sampling Data from May 23, 2005 through June 18, 2006
24	✓	NO 12	Adm	Standard Violations of E. coli and Fecal coliforms
25 ✓	✓	1	1	Standard Violations of Enterococci
26	✓	1	1	IRW USGS Sampling Sites for Bacterial Data
27				IRW USCG Stations with Fecal Strep. Measurements
28				Monitoring the Illinois River Basin Baron Fork at Eldon, Oklahoma
29				Unofficial Title 785. Oklahoma Water Resources Board, Chapter 45. Oklahoma Water Quality Standards
30	✓	NO 10	Adm	CV -- Taylor
31				Ex. 5 -- Motion for Preliminary Injunction and Integrated Brief in Support Thereof
32				Advertisement from The Oklahoman entitled "Letter to Citizens of Oklahoma" (State section, page 14)
33				Poultry Water Quality Handbook Second Edition Expanded
34				The Illinois Wild and Scenic River Study -- Final Report
35				Conservation Reserve Enhancement Program Proposal for the Illinois Watershed -- State of Arkansas
36				Illinois River Basin Tour
37				Oklahoma Poultry Litigation -- Location of Water Wells in the IRW
38				Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers
39 ✓	✓	NO 12	Adm	Letter from Miguel I. Flores, Director, OK WQPD to Jon L. Craig, Director, Water Quality Division, OKDEQ
40 ✓	✓	NO 12	Adm	Decision Document for EPA Action on Oklahoma 2006 Section 303(d) List

No.	Ofr	Obj	Adm	Description
41	✓	obj	Adm	Order Approving Settlement Agreement, Vacating Order of March 14, 2003, and Administratively Closing Case
42	✓	none	Adm	Map showing upper Illinois River
43				Figures C-1, C-2 and C-3 showing Pollution sources
44				Oklahoma NPDES Discharges within the Illinois River, Flint Creek and Barren Fork Scenic River Watersheds
45				2007 Update -- Coordinated Watershed Restoration and Protection Strategy for Oklahoma's Impaired Scenic Rivers
46	✓	none	Adm	Photograph of river scene
47	✓	none	Adm	Map highlighting Litter Transport Incentive Unavailable to Litter moved into the Highlighted Area
48				Map -- Impaired Waters Located in the Illinois River Watershed (Oklahoma)
49	✓	none	Adm	Map -- Scenic River Watersheds of Oklahoma
50	✓	none	Adm	Water, Swimming in Oklahoma's Lakes, Rivers and Streams
51				Waters and Water Rights
52	✓	none	Adm	Travel Southwest flyer -- River of Fun -- Oklahoma's Illinois River
53				Identification of a Poultry Litter Specific Biomarker and Development of a Quantitative Assay -- Detailed Report
54				Poultry Quantitative PCR Analytical Summary
55				Poultry Quantitative PCR Analytical Summary
56				Unofficial 785.45
57				Title 785 -- Oklahoma Water Resources Board
58				Unofficial -- Title 785. Oklahoma Water Resources Board, Chapter 46. Implementation of Oklahoma's Water Quality Standards
59	✓	none	Adm	CV -- Harwood
59-1	✓	none	Adm	Updated Harwood CV
60				Complete list of publications as to Harwood
61				Implementation Guidance for Ambient Water Quality Criteria for Bacteria May 2002 Draft
62				40 CFR part 131 Water Quality Standards for Coastal and Great Lakes Recreation Waters; proposed Rule
63				Ambient Water Quality Criteria for Bacteria -- 1986
64				Standard Operating Procedure (Draft); Quantification of a chicken litter specific Brevibacteria biomarker in environmental samples

No.	Ofc	Obj	Adm	Description
65				Identification of a Poultry Litter Specific Biomarker and Development of a Quantitative Assay
66				Method 1103.1: Escherichia coli (E. coli) in Water by Membrane Filtration Using Membrane-Thermotolerant Escherichia coli Agar (mTEC)
67				Detecting and Mitigating the Environmental Impact of Fecal Pathogens Originating from Confined Animal Feeding Operations: Review
68				Prepublication of Ground Water Rule Federal Register Notice; National Primary Drinking Water Regulations: Ground Water Rule
69				Health Effects Criteria for Marine Recreational Waters
70				Illinois River Watershed (USGS Sampling Sites)
71				Map - qPCR Poultry Specific Biomarker Analytical Results for Solid Samples
72				Map - qPCR Poultry Specific Biomarker Analytical Results for Water Samples
73				Poultry-Specific Biomarker Quantitative PCR Analytical Summary
74				Chicken Litter PCR Analytical Summary
75				Poultry Quantitative PCR Analytical Summary
76				Poultry Quantitative PCR Analytical Summary
77	✓	✓	NOV	Adm. Do U.S. Environmental Protection Agency Water Quality Guidelines for Recreational Waters Prevent Gastrointestinal Illness? A Systematic Review and Meta-analysis
78				Poultry Quantitative PCR Analytical Summary
79				Poultry Quantitative PCR Analytical Summary
80				Oklahoma Fertilizer Act 2; Okla. Stat. Section 8-77.3
81				Arkansas Soil Amendment Act 2; Ark. Stat. Section 2-19-402
82				Management and Utilization of Poultry Wastes
83				Farmer Estimates of Manure Application Rates
✓84	✓	NOV	Adm.	CV – Johnson
85				Soil Test Summary – Last 3 years Oklahoma and Arkansas – B. Fisher
86	✓	NOV	Adm.	Soil Amendment Act (2-8-85) and Soil Amendment Rules (35:30-30)
✓87	✓	NOV	Adm.	Science-based Animal Waste Phosphorus Management for Oklahoma
88				Relating Soil Phosphorus to Dissolved Phosphorus in Runoff: A Single Extraction Coefficient for Water Quality Modeling
89				Chart – Soil Sample, Av.P Level, Integrator

No.	Ofr	Obj	Adm	Description
90				Manure Nutrients Relative to the Capacity of Cropland and Pastureland to Assimilate Nutrients: Spatial and Temporal Trends for the United States
91	✓	none	Adm	OSU Soil Test Interpretations
92				Current Report – Oklahoma Agricultural Soil Test Summary 1994-1999
93				Potential Priority Watersheds for Protection of Water Quality from Contamination by Manure Nutrients
94	✓	none	Adm	Managing Phosphorus from Animal Manure
95				Prudent Agronomic Use of Nitrogen and Phosphorus from Poultry Litter
96				Oklahoma Agricultural Soil Test Summary – 2000-2003
97				Handbook of Soil Science (Excerpts)
98				Manure nutrients relative to the capacity of cropland and pastureland to assimilate nutrients: Spatial and temporal trends for the United States
99				Poultry Litter: Source of Excess Soil Phosphorus in Eastern Oklahoma
100				Prudent Agronomic Use of Phosphorus
101				Prudent Agronomic Use of Nitrogen and Phosphorus from Poultry Litter; Summary for Oklahoma and Arkansas portions of the Illinois Watershed
102				Confined Animal Production and Manure Nutrients
103				Exhibit 1 to Johnson Deposition
104	✓	none	Adm	CV – Teaf
105				Illinois River Watershed USGS Stations with E. coli measurements
106				Illinois River Watershed USGS Stations with Fecal Coliform measurements
107				Illinois River Watershed USGS Stations with Fecal Strep. measurements
108				Poultry and Water Quality – Water Quality Issues related to Poultry Production
109				Visitation Estimates Illinois River Corridor and Lake Tenkiller
110				Illinois River Watershed Sampling Sites
111				Oklahoma Poultry Litigation Illinois River Watershed -- CDM and USGS Bacteria Samples
112				Water Quality Standards for Coastal Recreation Waters: Using Single Sample Maximum Values in State Water Quality Standards
113				Poultry Houses in the IRW
114				Illinois River Watershed 2005 Spring Sampling

No.	Ofr	Obj	Adm	Description
115				Illinois River Watershed 2006 Spring Sampling
116				Oklahoma Poultry Litigation -- Location of Water Wells in the IRW
117				Oklahoma Poultry Litigation -- Illinois River Watershed Bacteria Samples from August 31, 2006 to Current
118				Unofficial. Title 785. Oklahoma Water Resources Board. Chapter 45. Oklahoma's Water Quality Standards
119				Unofficial Title 785. Oklahoma Water Resources Board -- Chapter 46. Implementation of Oklahoma's Water Quality Standards
120				Dry Poultry Manure Management
✓ 121	✓	none	Adm	USGS Sampling Sites for Bacteria Data -- IRW
122				Decision Document for EPA Action on Oklahoma 2006 Section 303(d) List
123				Engel's Expert Affidavit (filed with Nov 2007 PI Motion)
✓ 124	✓	none	Adm	CV -- Engel
125				Estimating Watershed Level Nonpoint Source Loading for the State of Oklahoma -- Final Report
126				An Investigation of the Sources and Transport of Nonpoint Source Nutrients in the Illinois River Basin in Oklahoma and Arkansas
127				Draft -- Estimate of Poultry Waste Generated Within the Illinois Watershed
✓ 128	✓	none	Adm	Estimate of Poultry Waste Generated Within the Illinois Watershed
129				Table of Integrators in IRW with Bird Type and House Size
✓ 130	✓	none	Adm	Table of Integrators in IRW with Bird Type and House Size
131				Location and Timing of Poultry Waste Disposal in the Illinois River Watershed
✓ 132	✓	none	Adm	IRW Poultry Waste Disposal
133				Chart -- IRW Land Disposal Timing
✓ 134	✓	none	Adm	Chart -- IRW Land Disposal Timing
135				Poultry Waste Disposal in Oklahoma including IRW as recorded by ODAFF for the Period 03/31/1998 through 04/5/2006 by Integrator
136				Analysis of ESWMT Records
✓ 137	✓	none	Adm	Analysis of ESWMT Records
✓ 138	✓			Summary of Data used in Verification Calculation
✓ 139	✓			Description of Verification Methodology



No.	Ofr	Obj	Adm	Description
✓ 140	✓	new	Adm	Poultry Waste Disposal in Oklahoma including IRW as recorded by ODAFF for the Period 03/31/1998 through 04/05/2006 by Integrator
141				Aerial Photo of Illinois River Watershed
142				Photograph – poultry waste
143				Photograph – poultry waste
144				Photograph – poultry waste
145				Photograph – poultry waste
146				Photograph – poultry waste
147				Photograph – poultry waste
148				Photograph – poultry waste
149				Photograph – poultry waste
150	✓	new	Adm	Photograph – poultry waste
151				Photograph – poultry waste
152				Photograph – poultry waste
153				Photograph – poultry waste
154	✓	new	Adm	CV – Fisher
155				Assessment of Hydrogeologic Understanding of Karstic Groundwater Basin Using a Numeric Model Simulating the Cave Spring Recharge Area, Cave Springs, Arkansas
156				Geohydrology of the Ozark Plateaus Aquifer System in Parts of Missouri, Arkansas, Oklahoma and Kansas
157				Graphs – Phosphorus/Metals and Correlations in Tenkiller Sediments
158				Photograph – poultry waste
159				Photograph – poultry waste
160	✓	new	Adm	CV – Olsen
161				A & L Analytical Report
162				CDM Evaluation of A & L
163				CDM Chain of Custody
164				EML Analytical Report

No.	Ofr	Obj	Adm	Description
165				SOP for edge of field sampling
166				DOCUMENT MARKED CONFIDENTIAL BY DEFENDANTS -- Evans and Evans Broiler Growing Agreement with Bloomfield
167				Responses of Cal-Maine Farms, Inc. to the Plaintiff's First Set of Interrogatories
168				Cargill, Inc.'s Second Supplemental Answer to Interrogatory No. 1 of Plaintiff's First Set of Interrogatories
169				Cargill, Inc.'s Answers to Plaintiff's First Set of Interrogatories
170				Cargill Turkey Production, LLC's Answers to Plaintiff's First Set of Interrogatories
171				Cargill, Inc.'s Response to State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
172				Cargill Turkey Production, LLC's Response to State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
173				Responses of Defendant, Peterson Farms, Inc. to First Set of Interrogatories and First Request for Production of Documents by Plaintiffs
174				DOCUMENT MARKED CONFIDENTIAL BY DEFENDANTS -- George's Broiler Growing Contract with Bailey Farms
175				First Supplemental Responses of Defendant, Peterson Farms, Inc. to First Set of Interrogatories and First Request for Production of Documents by Plaintiffs
176				Ex 10 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
177				Ex 11 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
178				Ex 1-1 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
179				Ex 12 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
180				Ex 1-2 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
181				Ex 13 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
182				Ex 1-3 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
183				Ex 14 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
184				Ex 15 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
185	✓	not	Adm	Ex 16 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
186				Ex 17 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
187				Ex 18-1 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
188				Ex 18-2 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
189				Ex 18-3 -- MOTION for Preliminary Injunction and Integrated Brief in Support Thereof



No.	Ofr	Obj	Adm	Description
190				Ex 2 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
191				Ex 3 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
192				Ex 4 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
193				Ex 5 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
194				Ex 6 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
195				Ex 7 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
196				Ex 8 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
197				Ex 9 – MOTION for Preliminary Injunction and Integrated Brief in Support Thereof
198				Second Supplemental Responses of Defendant, Peterson Farms, Inc. to First Set of Interrogatories and First Request for Production of Documents by Plaintiffs
199				Simmons Foods, Inc.'s Supplemental Answers to Plaintiff's First Set of Interrogatories
200				Simmons Foods, Inc.'s Answers to Plaintiff's First Set of Interrogatories
201				Tyson Chicken, Inc.'s Response to Plaintiff's First Set of Interrogatories
202				George's Inc.'s and George's Farms, Inc.'s Answers and Responses to the State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
203				George's Farms, Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to George's Farms, Inc.
204				Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production
205				Supplemental Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
206				George's Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to George's, Inc.
207				Simmons Foods, Inc.'s Responses to the State's April 20, 2007 Set of Requests to Admit and Request for Production
208				Tyson Chicken, Inc.'s Response to Plaintiff's First Set of Interrogatories
209				Tyson Chicken, Inc.'s Second Amended Response to Plaintiff's First Set of Interrogatories
210				Tyson Foods, Inc.'s Response to Plaintiff's First Set of Interrogatories
211				Tyson Foods, Inc.'s Second Amended Response to Plaintiff's First Set of Interrogatories
212				Tyson Poultry, Inc.'s Response to Plaintiff's First Set of Interrogatories
213				Tyson Poultry, Inc.'s Second Amended Response to Plaintiff's First Set of Interrogatories
214				Defendant Cobb-Vantress, Inc.'s Responses to the State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production

No.	Ofr	Obj	Adm	Description
215				Defendant Tyson Chicken, Inc.'s Responses to the State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
216				Defendant Tyson Foods, Inc.'s Responses to the State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
217				Defendant Tyson Poultry, Inc.'s Responses to the State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
218				Tyson Defendants' Responses to the State of Oklahoma's September 13, 2007 Set of Interrogatories and Requests for Production to All Defendants
219				Simmons Foods, Inc.'s Responses to State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
220				Simmons Foods, Inc.'s Amended and Supplemental Responses to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
221				Simmons Foods, Inc.'s Amended Responses to the State's April 20, 2007 Set of Requests to Admit and Request for Production
222				Simmons Foods, Inc.'s Answers to Plaintiff's September 13, 2007 Set of Interrogatories and Responses to Requests for Production
223				Tyson Chicken, Inc.'s Amended Response to Plaintiff's First Set of Interrogatories
224				Tyson Foods, Inc.'s Amended Response to Plaintiff's First Set of Interrogatories
225				Tyson Poultry, Inc.'s Amended Response to Plaintiff's First Set of Interrogatories
226				Cobb-Vantress, Inc.'s Amended Response to Plaintiff's First Set of Interrogatories
227				Cobb-Vantress, Inc.'s Supplemental Response to Plaintiff's First Set of Interrogatories
228				Cobb-Vantress, Inc.'s Second Amended Response to Plaintiff's First Set of Interrogatories
229				George's, Inc.'s Response to Plaintiff's First Set of Interrogatories
230				George's Farms, Inc.'s Responses to Plaintiff's First Set of Interrogatories
231				Tyson Foods, Inc.'s Supplemental Response to Plaintiff's First Set of Interrogatories
232				Order approving Settlement Agreement
233				Order appointing Special Master
234				Agreed Order amending the Settlement Agreement
235				Response of Cal-Maine Foods, Inc. to Plaintiff's October 11, 2007 Requests for Admissions and Request for Production
236				Responses of Cal-Maine Farms, Inc. to Plaintiff's September 13, 2007 Interrogatories
237				Emergency application for conference with the Court and for order approving phosphorous index
238				02/05/04 Order in <u>The City of Tulsa, et al. v. Tyson, et al.</u>
239				02/13/07 Order in <u>The City of Tulsa, et al. v. Tyson, et al.</u>

No.	Ofr	Obj	Adm	Description
240				Responses of Cal-Maine Foods, Inc. to Plaintiff's September 13, 2007 Interrogatories
241				Response of Cal-Maine Farms, Inc. to Plaintiff's October 11, 2007 Request for Admissions and Request for Production
242				Peterson Farms, Inc.'s Responses to State of Oklahoma's December 31, 2007 Set of Interrogatories, Requests for Production and Requests to Admit to Each Defendant
243				George's Farms, Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
244				George's Inc., and George's Farms, Inc.'s Responses to State of Oklahoma's September 13, 2007 Set of Interrogatories and Requests for Production
245				George's Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
246				Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's September 13, 2007 Set of Interrogatories and Request for Production
247				Defendant Tyson Poultry, Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
248				Defendant Cobb-Vantress, Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
249				Defendant Tyson Chicken, Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
250				Defendant Tyson Foods, Inc.'s Responses to the State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
251				Supplemental Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's April 20, 2007 Requests to Admit
252				Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's October 11, 2007 Set of Requests to Admit and Request for Production
253				Supplemental Objections and Responses of State of Oklahoma to Separate Defendant Tyson Chicken, Inc.'s First Interrogatories Propounded to Plaintiffs
254				Supplemental Objections and Responses of State of Oklahoma to Separate Defendant Tyson Foods, Inc.'s First Interrogatories Propounded to Plaintiffs
255				Supplemental Objections and Responses of State of Oklahoma to Separate Defendant Tyson Poultry, Inc.'s First Interrogatories Propounded to Plaintiffs
256				Objections and Responses to Interrogatories and Request for Production of Integrator Defendant Simmons Foods, Inc.
257				State of Oklahoma's Response to Cal-Maine Foods, Inc.'s Interrogatories 1, 2, 5 and Response to Request for Production
258				Objections and Responses to Peterson Farms' Interrogatories and Requests for Production of Documents served March 30, 2007
259				George's Hatching Egg Production Contract with Marty Bayer
260				Amended Responses of Cal-Maine Farms, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
261				Responses of Cal-Maine Farms, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
262				Responses of Cal-Maine Foods, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
263				Amended Responses of Cal-Maine Foods, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
264				Defendant Tyson Poultry, Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Requests for Production

No.	Ofr	Obj	Adm	Description
265				Defendant Cobb-Vantress, Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Requests for Production
266				Defendant Tyson Chicken, Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Requests for Production
267				Defendant Tyson Foods, Inc.'s Responses to the State of Oklahoma's April 20, 2007 Set of Requests to Admit and Requests for Production
268				George's, Inc.'s Amended and Supplemental Responses to the State of Oklahoma's April 20, 2007 Requests to Admit
269				Simmons Foods, Inc.'s Responses to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
270				Answer of Cargill, Inc. to Plaintiff's Second Amended Complaint
271				Defendant Peterson Farms, Inc.'s Answer to Second Amended Complaint
272				Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's May 30, 2006 Set of Requests for Production to Poultry Integrator Defendants
273				Simmons Breeder Agreement with Chue Moua DBA Boncha Farm
274				Cargill, Inc.'s Supplemental Answers to Plaintiff's First Set of Interrogatories
275				George's Broiler Growing Contract with Bess West
276				Responses of Defendant, Peterson Farms, Inc. to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production
277				Cargill, Inc.'s First Supplemental Answer to Interrogatory No. 1 of Plaintiff's First Set of Interrogatories
278				Cargill, Inc.'s Response to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production to Cargill, Inc.
279				Cargill Turkey Production, LLC's Response to State of Oklahoma's March 2, 2007 Set of Interrogatories and Requests for Production to Cargill Turkey Production, LLC
280				Cobb-Vantress, Inc.'s Responses to State of Oklahoma's July 10, 2006 Set of Requests for Production
281				Simmons Foods, Inc.'s Responses to the State's April 20, 2007 Set of Requests to Admit and Request for Production
282				Cargill Turkey Production, LLC's Supplemental Answers to Plaintiff's First Set of Interrogatories
283				Cargill, Inc.'s Amended Response to State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to Cargill, Inc.
284				Cargill Turkey Production, LLP's Amended Response to State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to Cargill Turkey Production, LLP
285				George's Pullet Growing Contract Bob Lee
286				Cargill Turkey Production, LLP's Response to State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to Cargill Turkey Production, LLP
287				Cargill Turkey Production, LLC's First Supplemental Answer to Interrogatory No. 1 of Plaintiff's First Set of Interrogatories
288				Defendant Cargill Incorporated's Response and Objections to Plaintiff's September 13, 2007 Set of Interrogatories and Requests for Production to All Defendants
289				Defendant Cargill Turkey Production, LLC's Responses and Objections to Plaintiff's September 13, 2007 Set of Interrogatories and Requests for Production to All Defendants

No.	Ofr	Obj	Adm	Description
290				Cargill, Inc.'s Response to State of Oklahoma's April 20, 2007 Set of Requests to Admit and Request for Production to Cargill, Inc.
291				Cargill Turkey Production, LLC's Second Supplemental Answer to Interrogatory No. 1 of Plaintiff's First Set of Interrogatories
292				Cargill, Inc.'s Response to Plaintiff's October 3, 2007 Set of Interrogatories and Requests for Production
293				Cargill Turkey Production, LLC's Response to Plaintiff's October 3, 2007 Set of Interrogatories and Requests for Production
294				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/TysonCares/Environment.aspx">http://www.tyson.com/Corporate/AboutTyson/TysonCares/Environment.aspx</a>
295				Advertisement from The Oklahoman entitled "Letter to Citizens of Oklahoma" (State Section, Page 14)
296				Advertisement from Tulsa World entitled "How can we have too much of a good thing?"
297				Answer and Affirmative Defenses of Cal-Maine Foods, Inc. and Cal-Maine Farms, Inc. to Plaintiff's Second Amended Complaint
298				Responses of Cal-Maine Foods, Inc. to the Plaintiff's First Set of Interrogatories
299				Cargill, Inc.'s Responses to State of Oklahoma's December 31, 2007 Set of Interrogatories, Requests for Production and Requests to Admit
300				Poultry Environmental Issues and Impacts
301				Putting Nutrient Mgmt to Work
302				Dry Waste Mgmt
303				Planning Poultry Waste Mgmt
304				DOCUMENT MARKED CONFIDENTIAL BY DEFENDANTS -- Fixed Term Turkey Feeding and Management Agreement Springdale Ar [Cargill Turkey Production LLC and Robert Schwabe II]
305				DOCUMENT MARKED CONFIDENTIAL BY DEFENDANTS -- Portion of Poultry Water Quality Handbook
306				Poultry Water Quality Handbook Second Edition Expanded
307				Portion of Poultry Water Quality Handbook
308				Portion of Poultry Water Quality Handbook
309				Portion of Poultry Water Quality Handbook
310				Portion of Poultry Water Quality Handbook
311				Portion of Poultry Water Quality Handbook
312				Portion of Poultry Water Quality Handbook
313				Portion of Poultry Water Quality Handbook
314				Portion of Poultry Water Quality Handbook



No.	Ofr	Obj	Adm	Description
315				Portion of Poultry Water Quality Handbook
316				Portion of Poultry Water Quality Handbook
317				Portion of Poultry Water Quality Handbook
318				Portion of Poultry Water Quality Handbook
319				Portion of Poultry Water Quality Handbook
320				Portion of Poultry Water Quality Handbook
321				Portion of Poultry Water Quality Handbook
322				Portion of Poultry Water Quality Handbook
323				Form letter from Cargill to its growers regarding amendment of Turkey Feeding and Management Agreements
324				Amended Responses of Cal-Maine Foods, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
325				Amended Responses of Cal-Maine Foods, Inc. to Plaintiff's April 20, 2007 Requests for Admissions and Request for Production
326				Commercial Egg Production Agreement between Cal-Maine and Biggs 4
327				Commercial Pullet Grown Agreement between Cal-Maine Foods and John M. Dial
328				Breeder Egg Production Agreement
329				Breeder Rooster Brooding and Rearing Agreement
330				Breeder Pullet Brooding and Rearing Agreement
331				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/Growers.aspx">http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/Growers.aspx</a>
332				Answer of Cargill Turkey Production LLC to Plaintiff's Second Amended Complaint
333				Cargill Turkey Production, LLC's Responses to State of Oklahoma's December 31, 2007 Set of Interrogatories, Requests for Production and Requests to Admit to Each Defendant
334				Steve Storm 30(b)(6) Deposition Exhibit 1 – Second Amended Notice of Deposition of Cal-Maine Foods
335				Robert Gilmore 30(b)(6) Deposition Exhibit 1 – Second Amended Notice of Deposition of Cal-Maine Foods
336				Supplemental Affidavit of Valerie J. Harwood
337				Benny McClure 30(b)(6) Deposition Exhibit 1 – Notice of Deposition of George's Inc.
338				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/LiveProduction/Feedmill/Processes.aspx">http://www.tyson.com/Corporate/AboutTyson/LiveProduction/Feedmill/Processes.aspx</a>
339				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/LiveProduction/Chicken.aspx">http://www.tyson.com/Corporate/AboutTyson/LiveProduction/Chicken.aspx</a>



No.	Ofr	Obj	Adm	Description
340				Printout of information found at Peterson--Company Tour--Description of company operations-feed mill, hatcheries, plant.pdf
341	✓	none	Adm	CV - Caneday
342	✓	none	Adm	Presentations/Publication - Olsen
343				Kirk Houtchens, Ray Wear 30(b)(6) Deposition Exhibit 1 - Amended Notice of Deposition of Peterson Farms
344				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/QualityAssurance.aspx">http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/QualityAssurance.aspx</a>
345				DOCUMENT MARKED CONFIDENTIAL BY DEFENDANTS - Broiler Agreement between Simmons Foods, Inc. and Joel Reed
346				Responses of Cal-Maine Farms, Inc. to Plaintiff's December 31, 2007 Requests for Admissions
347				Responses of Cal-Maine Farms, Inc. to Plaintiff's December 31, 2007 Requests for Admissions
348				Responses of Cal-Maine Foods, Inc. to Plaintiff's December 31, 2007 Requests for Admissions
349				Responses of Cal-Maine Foods, Inc. to Plaintiff's December 31, 2007 Requests for Admissions
350				Science-Based Animal Waste Phosphorus Management for OK
351				Simmons Foods, Inc.'s Answer to Plaintiff's Second Amended Complaint
352				Printout of information found at <a href="http://www.simmonsfoods.com/about-theenvironment.php">http://www.simmonsfoods.com/about-theenvironment.php</a>
353				Tyson Environmental Poultry Farm Management (Leasea Butler, Patrick Pilkington, Steven Patrick, Chester Wienusz, Read Hudson Deposition Exhibit 20)
354	✓	none	Adm	Tyson Environmental Poultry Farm Management (Leasea Butler, Patrick Pilkington, Steven Patrick, Chester Wienusz, Read Hudson Deposition Exhibit 21)
355	✓			Broiler Production Contract between Tyson Poultry, Inc. and Bob Lee
356	✓			Cobb Vantress GP Hen Contract with Bill Anderson
357	✓			Cobb Vantress GP Pullet Contract with Bill Anderson
358	✓			Tyson Chicken, Inc. Breeder Pullet Contract Noel with Robert and Donni Sue White
359				Answer and Affirmative Defenses of Defendants Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc. and Cobb-Vantress, Inc. to the Second Amended Complaint
360	✓	none	Adm	Printout of information found at <a href="http://www.tysonfoodsinc.com/corporate/info/environment.asp">http://www.tysonfoodsinc.com/corporate/info/environment.asp</a>
361				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/GrowersFAQ.aspx">http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/GrowersFAQ.aspx</a>
362				Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTysonLocations/ListPage.aspx">http://www.tyson.com/Corporate/AboutTysonLocations/ListPage.aspx</a>
363	✓	none	Adm	Printout of information found at <a href="http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/QualityAssurance.aspx">http://www.tyson.com/Corporate/AboutTyson/CompanyInformation/QualityAssurance.aspx</a>
364	✓	none	Adm	Deposition Exhibit, Ray Wear - Poultry Water Quality Handbook

No.	Ofr	Obj	Adm	Description
365				Answer of Willow Brook Foods, Inc. to Second Amended Complaint
366				GROWER MASTER TABLE 071907
367				District Report 2007
368				Summary of ODAFF soil stp
369	✓	None	Adm	Disease Rates
370				EOF Samples_100,000#A71A
371				Floater v. LA
372				Illinois_River_GIS_Data, available at <a href="http://www.deq.state.ok.us">www.deq.state.ok.us</a>
373				Exhibit 46 to Cal-Maine 30(b)(6) deponent
374				Exhibit 47 to Cal-Maine 30(b)(6) deponent
375	✓	None	Adm	CDM, Inc. Firm Experience
376				Email from James Graves to Richard Garren re: Bird totals
377				Answer of Separate Defendants George's Inc. and George's Farms, Inc. to Plaintiff's Second Amended Complaint
378				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
379				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Growers
380				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
381				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
382				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
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386				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
387				OK Registered Poultry Feeding Operations Inspection Checklist for Willowbrook Grower
388				Edge of Field Scope of Work
389				George's Inc. and George's Farms, Inc.'s Supplemental Response to Plaintiff's First Set of Interrogatories

No.	Ofr	Obj	Adm	Description
390				Bird totals
391				IRW Breeders – Created by Court Order - Not Kept in Ordinary Course of Business
392				IRW Broilers – Created by Court Order - Not Kept in Ordinary Course of Business
393				Printout of information found at <a href="http://www.simmonsfoods.com/about-verticalintegration.php">http://www.simmonsfoods.com/about-verticalintegration.php</a>
394				Final – Programmatic Environmental Assessment for Implementation of the Conservation Reserve Enhancement Program Agreement for the Illinois River Watershed in Arkansas
395				Final – Programmatic Environmental Assessment for Implementation of the Conservation Reserve Enhancement Program Agreement for Oklahoma
396				Illinois River and Baron Fork Watershed Implementation Project
397				Active Poultry Houses Located in the IRW (2005-2006)
✓398	✓	none	Adm	Reported Campylobacter Infection Rates in Adair Co., OK
✓399	✓			Examples of Historical Reference Information Regarding Bacterial Impacts of Poultry Waste Application
✓400	✓			Bacterial Levels in Groundwater Samples
✓401	✓			Groundwater Wells in the IRW
✓402	✓			Comparison Between Temporal Pattern Application of Poultry Litter to Fields and Recreational Uses of Rivers/Streams in IRW
✓403	✓			Lines of Evidence Supporting Conclusion of Poultry as a Major Source of Bacterial Loading to IRW
✓404	✓			Summary of Bacterial Illnesses and Symptoms
✓405	✓	none	Adm	Summary of Edge-of-Field Results for Bacterial Following Litter Application
✓406	✓			Bacterial Contamination at Public Access Areas on the Illinois River
✓407	✓			Summary of Geometric Mean and Single Point Bacterial Exceedances for IRW Surface Waters
✓408	✓			Locations of Exceedances of Oklahoma Bacterial Surface Water PBCR Criteria Outside of Segments Designated as “Impaired Waters”
✓409	✓			Impaired Surface Water Segments for Illinois River in Oklahoma
✓410	✓			Reported Salmonella Infection Rates in Adair Co., OK
411	✓	none	Adm	P Soil Test Calibration, P requirement
412	✓	none	Adm	Phosphorus Soil Test calibration
✓413	✓	none	Adm	PI Johnson Map 30
✓414	✓	none	Adm	Summary of public STP data for Arkansas

No.	Ofr	Obj	Adm	Description
✓ 415	✓	none	Adm	Summary of George's and Tyson Combined STP
416				Relating Soil Phosphorus to Dissolved Phosphorus in Runoff: A Single Extraction Coefficient for WQ Modeling
✓ 417	✓	none	Adm	Manure Nutrients Relative to the Capacity of Cropland and Pastureland to Assimilate Nutrients USDA (2000)
✓ 418	✓	none	Adm	Cover sheet to Exhibit 19 to Gordon Johnson Depo
419				Confined Animal Production and Nutrients (USDA 2000)
420	✓	none	Adm	Arkansas Natural Resources Commission Summary
421	✓	APSC	Adm	Arkansas Natural Resource Commission Summary
✓ 422	✓	none	Adm	Family canoeing recreation photo
423	✓	none	Adm	Family riverside recreation photo
✓ 424	✓	none	Adm	Summary Exhibit of Floaters by Month
✓ 425	✓	none	Adm	Summary Exhibit of Floaters by Year
426	✓	none	Adm	Summary of the 6 Step Method of waste calculation
✓ 427	✓	none	Adm	Map of Active Poultry Houses Located in IRW with aerial photo insets of farms and summary table of poultry waste calculation
✓ 428	✓	none		Photos of Poultry Waste Pile with investigator reports
✓ 429	✓	none		Photos of Waste Spreading with investigative reports
✓ 430	✓	none		Karst geology and water flow
431				Fisher Deposition Exhibit #9
432				Fisher Deposition Exhibit #10
✓ 433	✓	none	Adm	Recreational Water Quality Standards
✓ 434				Wade Graph
✓ 435				Biomarker Development Flow Chart
✓ 436				Sampling Stations for PCR 16S-RNA Data
✓ 437				Correlation of Fecal Coliform with E. coli Concentrations in Environmental Samples
✓ 438				Correlation of Brevibacterium QPCR with E. coli Concentration in Environmental Samples
✓ 439				Correlation of Brevibacterium QPCR with Enterococci Concentration in Environmental Samples

No.	Ofr	Obj	Adm	Description
440	✓	none	Adm	Correlation of Brevibacterium QPCR with Fecal Coliform Concentration in Environmental Samples
441	✓	none	Adm	Map of Stream Segments Listed as Impaired on Oklahoma's 2006 Integrated Water Quality Assessment Report
442	✓	none	Adm	PowerPoint with Excerpts of Reports Documenting Bacterial Contamination in Illinois River
443	✓	none	Adm	Chart: Vertical Integration in the Broiler Industry
444	✓	✓	✓	Primary Body Contact Recreation Water Quality Standards
445	✓	✓	✓	Figure 1.2 and accompanying text. Implementation Guidance for Ambient Water Quality Criteria for Bacteria
446	✓	✓	✓	Table 1.1 Implementation Guidance for Ambient Water Quality Criteria for Bacteria
447	✓	obj	(Not Adm)	Integrator Control
448				Uniformity of Method
449				Poultry Defendants' Bird Populations
450	✓	none	Adm	Site Conceptual Model
451	✓	✓	✓	PCA Steps
452	✓	✓	✓	Pathway Components
453	✓	none	Adm	Sample Numbers
454	✓	none	Adm	Summary Poultry Fingerprint
455	✓	none	Adm	Summary Poultry Fingerprint
456				Summary Poultry Fingerprint
457	✓	none	Adm	Fingerprint Comparisons WWTP
458				Fingerprint Comparisons WWTP
459	✓	none	Adm	Fingerprint Comparisons Poultry & Cattle
460				Fingerprint Comparisons Poultry & Cattle
461	✓	none	Adm	Waste Impact
462				Waste Impact
463	✓	none	Adm	Burlington Northern -- Imminent and Substantial Endangerment
464				Elements of a claim under 42 U.S.C. Sec. 6972(a)(1)(B)

No.	Ofr	Obj	Adm	Description
465	✓	doc	Adm	Definition of Solid Waste under RCRA
466	✓	none	Adm	Surface & Groundwater IRW locations with poultry waste contamination (A)
467				Surface & Groundwater IRW locations with poultry waste contamination (B)
468	✓	none	Adm	Photo excerpted from State's Exhibit #429

(For Additional lines, press Enter or Tab)

469 ✓ none Adm Affid w/attachment of Gary Murphy

473 ✓ none Adm MMWR (Dr. G. S. S.)

✓ 474 ✓ none Adm w/Dr. DuPont - EPT Detection, Fecal

512 T.H. 22 Risk code

515 Report

516 ✓ obj. Adm - Site application

521 ✓ none Adm - Mortality, Report w/ Dr. DuPont

522 ✓ none Field Notebook (Dr. Clay) w/ Tables

523 ✓ none Adm Phosphorus (Dr. Clay)

524 ✓ none Adm Poultry, Water quality manual (clay)

527 ✓ none Adm (Dr. Clay) Tables?

537 ✓ none Adm (Dr. Clay) Tables?

539 ✓ none Adm Paper USGS Collection/analysis (Dr. Konnet)

544 ✓ none Adm Paper Age Dating Chemicals

540 ✓ none Adm Paper Animal Manure Comparison

541 ✓ none Adm Chart used in PCA

542 ✓ none Adm Maps of IRW

549 ✓ none Adm (Dr. Dicks)

521 ✓ none Adm OSU study (Dr. Dicks)

612 } } }

610 } } }

611 } } }

609 } } } USGA Report

547 ✓ obj. (Not Adm) EPA Risk assessment

480 ✓ none Adm Study by Dr. Coale

613 ✓ none Adm T&amp;E Document

574 ✓ none Adm Report by Dr. Sullivan

602 ✓ none Adm Grass Hopping, fecal matter article

591 ✓ none Adm Grass Hopping, fecal matter article

593 ✓ none Adm Dr. Sullivan Document

578 ✓ none Adm USGS Data

581 USGS Data

582 USGS Data

584 ✓ none Adm Data

580 ✓ none Adm

574 ✓ obj. (Not Adm) w.b pg

587 ✓ obj. (Not Adm)

6486 ✓ none Adm



GREEN R2: Billy Clay 3-7-08

STATE'S EXHIBIT #523

AGRICULTURE WASTE MANAGEMENT  
FIELD BOOK *excerpts*

✓ none Adm

STATE'S EXHIBIT #525

CHART OVERLAY ON DEFENDANT EX PI-  
D23

✓ none Adm

STATE'S EXHIBIT #539

POULTRY WATER QUALITY MANUAL (AT  
PIGEGON 497)

✓ none Adm

EXHIBIT #524

SOIL TESTS REPORTS TYSON GROWER AND  
GEORGE'S

✓ none Adm

STATES' EXHIBIT #527

DEFENDANTS DOCUMENT D2290021 &  
STATE'S NLCD MAP WITH LEGENDS FOR  
LAND USE

✓ none Adm

UNOT  
MANAGED { EMAILS JOES TO CLAY 12/18/07 AT CLAY-PI-007-08

ARTICLE BY COX, GRIFFITH ANGLES DEERE AND FERGUSON)-  
"CONCENTRATION OF PATHOGENS AND INDICATORS IN ANIMAL  
FECES IN THE SYDNEY WATERSHED" MAY 2005 (CLAY-PI-0862)

*[Handwritten signature]*